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Attorney for Plaintiff

JEFF & AMY, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JEFF & AMY, INC., et al.,

Plaintiffs,

v.

AMERICAN ECONOMY INSURANCE  
COMPANY, an Indiana corporation, and DOES  
ONE through TWENTY inclusive.

Defendants.

**Case No. 3:12-cv-02075-JST**

**STIPULATION AND ~~PROPOSED~~  
ORDER AMENDING CERTAIN  
DATES SET FORTH IN THE JULY 25,  
2012 CASE MANAGEMENT ORDER  
[ECF NO. 21]**

1 Plaintiff JEFF & AMY, INC. (“Jeff & Amy”), and defendant AMERICAN ECONOMY  
 2 INSURANCE COMPANY (“AEIC”), erroneously sued as Safeco Insurance Company of America  
 3 (collectively the “Parties”), by and through their respective counsel, and subject to the Court’s  
 4 order, hereby stipulate and agree as follows:

5 WHEREAS, on or about July 25, 2012 this Court issued a Case Management Order (ECF  
 6 No. 21) setting forth the following schedule, in part, for this matter:

7 Completion of Fact Discovery: [4/5/13]

8 Disclosure of identities and reports of expert witnesses: [4/12/13]  
 9 Supplemental: [5/10/13]

10 Completion of Expert Discovery: [5/31/13]

11 All case-dispositive motions to be heard at 2:00 P.M. on or before: [6/20/13]

12 WHEREAS, on or about February 12, 2013, this Court issued a Reassignment Order (ECF  
 13 No. 25) maintaining the fact and expert discovery deadlines, and vacating the pretrial conference  
 14 and trial dates;

15 WHEREAS, the primary dispute between the Parties pertains to Jeff & Amy’s business  
 16 income loss claim;

17 WHEREAS, following the issuance of the March 4, 2013 Stipulated Protective Order, Jeff  
 18 & Amy produced additional documents – which it contends are confidential – that it contends  
 19 support its business income loss claim;

20 WHEREAS, the Parties have agreed to continue discussions regarding the possible  
 21 informal resolution of this action, and have agreed to engage in those further discussions before  
 22 incurring the expense associated with depositions;

23 WHEREAS, considerations of efficiency and judicial economy support extending the  
 24 deadline to complete discovery in order to facilitate discussions between the Parties regarding a  
 25 possible informal resolution;

26 WHEREAS, the Parties wish to extend only the discovery and motion deadlines.

27 IT IS HEREBY STIPULATED by and between Jeff & Amy and AEIC that the schedule  
 28 set forth in the Court’s July 25, 2012 Case Management Order (ECF No. 21) be amended as

1 follows:

2 Completion of Fact Discovery: [5/31/13]

3 Disclosure of identities and reports of expert witnesses: [6/7/13]  
4 Supplemental: [7/5/13]

5 Completion of Expert Discovery: [7/26/13]

6 All case-dispositive motions to be heard at 2:00 P.M. on or before: [8/15/13]

7 DATED: March 28, 2013

LAW OFFICE OF BRIAN K. VARGHESE

8  
9 By: /s/ Brian K. Varghese

10 Brian K. Varghese, Esq.  
11 Attorney for Plaintiff  
12 JEFF & AMY, INC.

13 DATED: March 28, 2013

SEDGWICK LLP

14  
15 By: /s/ Jason J. Chorley

16 Bruce D. Celebrezze  
17 Nicholas J. Boos  
18 Jason J. Chorley  
19 Attorneys for Defendant  
20 AMERICAN ECONOMY INSURANCE  
21 COMPANY

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: April 1, 2013

